

Exhibit B

From: Grossman-Boder, Yonatan L. <YGrossman-Boder@proskauer.com>
Sent: Friday, December 17, 2021 2:46 PM
To: Chalke, Douglas <dchalke@maglaw.com>
Cc: McKenna, Kathleen M. <KMckenna@proskauer.com>; Fischer, Rachel S. <rfischer@proskauer.com>
Subject: [External] RE: Eckhart v. Fox News Network, LLC et al

Hi Doug,

I hope all is well with you as well. The last communication on the topic with Plaintiff's team was the email we sent on November 19, 2021 to Renan Varghese and John Crain. As we are sure you observed, they have not yet addressed our edits to the ESI protocol contained in that email.

Best.
Yoni

Yonatan Grossman-Boder

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From: Chalke, Douglas <dchalke@maglaw.com>
Sent: Friday, December 17, 2021 9:40 AM
To: Grossman-Boder, Yonatan L. <YGrossman-Boder@proskauer.com>
Subject: Eckhart v. Fox News Network, LLC et al

This email originated from outside the Firm.

Hi Yoni,

Hope you're doing well. Regarding the *Eckhart* case, have you all been working with Wigdor regarding ESI collection and search terms? It seems to me like that issue was left open in the email correspondence, but I was wondering whether progress has been made since then? So far we have just been working on those things internally.

Please let me know if you have any questions.

Thanks a lot,
Doug

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